

# **Exhibit 6**

## **(Redacted)**

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**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION**

UNITED STATES OF AMERICA, et al.,  
Plaintiffs,

v.

GOOGLE, LLC,  
Defendant.

Case No. 1:23-cv-00108 (LMB/JFA)

HON. LEONIE H. BRINKEMA

EXPERT REPLY REPORT OF GORANKA BJEDOV

August 11, 2025

strategies that enable safe transitions without service interruption, such as canary rollouts and shadow testing.<sup>7</sup>

8. I further demonstrate that my plan accounts for the technical complexity of AdX and DFP throughout each stage of the migration process in Section III.B. This includes the work involved in mapping and replacing proprietary dependencies, isolating services, modifying integration points, and validating performance at each stage.

9. [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED] [REDACTED]  
[REDACTED]<sup>8</sup>

10. In addition, I clarify the preconditions assumed in my proposed plan and timeline in Section III.C. These preconditions are consistent with industry practice and reflect the natural boundary between legal and business activities and technical execution. The process of actually migrating AdX and DFP would not begin until an acquirer is identified.<sup>9</sup> However, some of the activities of my proposed migration plan may begin while legal and business activities are ongoing and before an acquirer is identified, such as demarcating an initial scope of code to be migrated, creating a wrapper to isolate the system calls to proprietary services that would be replaced to set up for potential alternative system options, and performing parts of the deployment analysis.

11. In response to the industry case study examples I discuss in Section V of my Opening Report, Dr. Nieh [REDACTED]

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<sup>7</sup> See Expert Report of Goranka Bjedov, PhD, United States of America, et al., v. Google, LLC, Case No. 1:23-cv-00108, July 7, 2025 (“Bjedov Opening Report”), ¶ 189 (“Each service can be analyzed in parallel by its own two-to-three-person engineering pod. Pods may own the code inspection, build a stub (or full replacement), define tests (see Section IX.D), and shepherd the change through canary and production ramps.”) and ¶ 194 (“The actual mechanics for this process are straightforward. Every new service is launched with three settings. First, it is *disabled*, which means the system is still using a test version. Second, it moves to *shadow mode*, where real traffic is sent to the new service behind the scenes, but its answers aren’t actually used”) (emphasis in original).

<sup>8</sup> Bjedov Opening Report, Section IX.C.

<sup>9</sup> However, additional migration work could begin without the identification of an acquirer if, for whatever reason, the target environment for the migration (e.g., GCP) has already been determined. In this case, Google could choose replacements for its services with the best alternatives from the landing zone.

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[REDACTED]

12. [REDACTED]

[REDACTED]

10. [REDACTED]

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

15

[REDACTED]

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[REDACTED]

[REDACTED]

[REDACTED]

[illegible][illegible]

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- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

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[REDACTED]

**B. My Plan Accounts for the Technical Demands of Migrating AdX and DFP**

34. [REDACTED]

[REDACTED]



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[REDACTED]

[REDACTED]

1) My Plan Accounts for the Technical Demands of Migrating AdX and DFP

36. [REDACTED]

a) I Consider Complexity in My Assessment of the Effort to Migrate Dependencies in AdX and DFP

[REDACTED]

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37.

[REDACTED]

[REDACTED]

[REDACTED]

58

[REDACTED]

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

[REDACTED]

2) I Account for Planning, Service Evaluation, and Rewriting in the Proposed Timelines

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<sup>70</sup> Bjedov Opening Report, Section IX.C.

<sup>71</sup> Bjedov Opening Report, Section IX.D.

<sup>72</sup> [REDACTED]

<sup>74</sup> Bjedov Opening Report, Section IX.C.

4. [REDACTED]

[REDACTED]

[REDACTED]

a) My Proposal Accounts for Planning

44. [REDACTED]  
[REDACTED]  
[REDACTED]

[REDACTED]

[REDACTED] [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] [REDACTED]

[REDACTED]

[REDACTED]

[illegible]

<sup>79</sup> See, e.g., “Advertising, Data Protection and Privacy,” Amazon Ads, accessed August 7, 2025, <https://advertising.amazon.com/resources/ad-policy/eu-data-protection-and-privacy> (“[Amazon systems and processes] meet our own high standards and the requirements of all applicable data protection laws, including the General Data Protection Regulation (GDPR) and the Privacy and Electronic Communications Directive (ePrivacy Directive). Amazon Ads services comply with the requirements of the GDPR, the ePrivacy Directive and other applicable law.”); “Privacy Policy,” Criteo, last modified April 4, 2025, <https://www.criteo.com/privacy/> (“Criteo

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46.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

b) Evaluating Appropriate Replacements is Part of Technical Decoupling

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

participates in the IAB Europe Transparency & Consent Framework and complies with its Specifications and Policies.”); “Privacy and The Trade Desk Platform,” The Trade Desk, last modified February 28, 2025, <https://www.thetradedesk.com/legal/privacy> (“The Trade Desk is a member in good standing of the Network Advertising Initiative (NAI). The Trade Desk also follows the industry self-regulatory guidelines of the Digital Advertising Alliance, the Digital Advertising Alliance of Canada, and the European Digital Advertising Alliance. The Trade Desk also implements and adheres to the specifications and policies of the IAB EU Transparency & Consent Framework as part of our compliance with EU data protection law.”).

<sup>80</sup> “Rehosting Mainframe Applications on the Sun Platform,” Sun Microsystems, (2001): 1–14, at 6 <https://www.cambex.com/products/mfrehosting/Whitepapers/Sun%20rehosting.pdf> (“The embedded business rules of the customer’s mainframe applications, which define the business processes and provide competitive differentiation, are completely preserved, so no changes to business processes or practices are required. With Sun rehosting solutions, end users typically experience no change to their interaction with familiar applications.”).

<sup>81</sup> See Bjedov Opening Report, ¶ 68

[REDACTED]

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[REDACTED]

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[REDACTED]

49.

[REDACTED]

[REDACTED]

83

[REDACTED]

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(i)

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

91

[REDACTED]



[illegible]

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- 4) Shut down the old systems once traffic is fully moved over to the new system.

95 [REDACTED] [REDACTED]  
[REDACTED] [REDACTED]  
[REDACTED] [REDACTED]  
[REDACTED]  
[REDACTED]

## 2) Software Migrations and Software Deployments Have a Very Close Relationship

96. [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

<sup>220</sup> Bjedov Opening Report, Section IV.B.

[illegible]

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97. [REDACTED]  
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228 [REDACTED]  
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